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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA**

**JUL 26 2021**

**CLERK, U.S. DISTRICT COURT  
ST. PAUL, MINNESOTA**

Randall J. May

Case No.: 1:21-cv-00710 (ADM/ECW)

Plaintiff,

V.

Delta Air Lines,

Defendant.

**PLAINTIFF'S REQUEST FOR  
PRODUCTION OF DOCUMENTS  
PHASE 1**

**TO: DEFENDANT DELTA AIR LINES AND DEFENDANT'S UNDERSIGNED  
ATTORNEY'S BRIAN MOEN AND BEN KAPPELMAN AT:**

**DORSEY AND WHITNEY LLP**

**50 SOUTH SIXTH STREET, SUITE 1500**

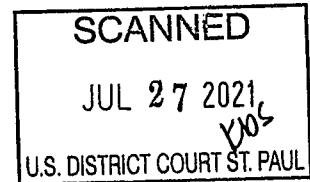
**MINNEAPOLIS, MN 55402**

Plaintiff Randall J. May requests Defendant Delta Air Lines, Inc., produce, permit, and make available for inspection and copying all of the Documents and other things described below within thirty (30) days after receipt of this service.

**DEFINITIONS AND INSTRUCTIONS**

Plaintiff hereby incorporates by reference the Definitions and Instructions set forth in Plaintiff's Interrogatories to Defendant Phase 1 served concurrent to these Document Requests.

**REQUESTS FOR PRODUCTION OF DOCUMENTS**



**REQUEST NO. 1:** All Documents including, but not limited to, audio and/or video recordings, photographs, diaries, logs, letters, notes, calendars, journals, intra-office Communication, email Communication, all of Plaintiff's emails from his [Randall.May@Delta.com](mailto:Randall.May@Delta.com) account, text messages or electronic data that Delta Air Lines or its employees or contractors have made or possess that constitute, reference, summarize, describe or memorialize any Communications, conversations, statements, acts, omissions or events involving Plaintiff Randall J. May that refer or relate in any way to the claims, issues, allegations, or events described in this lawsuit.

**REQUEST NO. 2:** All Communications related to Kelly Patton, Anthony Spencer, Leah Gajria, Annelise Sanders, and Lori Dehn and their employment at Delta Air Lines.

**REQUEST NO. 3:** All Documents and Communications related to the Disability Accommodation Process at Delta Air Lines. Include trainings passed and taken by Kelly Patton, Leah Gajria, and Annelise Sanders to insure their knowledge of the Americans with Disabilities Act was complete.

**REQUEST NO. 4:** All documents related to the financial assistance provided by the United States of America to Delta Air Lines in 2020 and line items of how the \$5,000,000,000 plus has been spent so far. All Documents and Communications that show the pleading, bargaining, begging, deployment of lobbyists to secure billions of dollars for the Defendant from the United States of America.

**REQUEST NO. 5:** All Documentation and Communications that include the topic of suppressing workers rights to collective bargaining and forming a Union. Include all merger

Documentation from the Northwest Airlines and Delta Air Lines merger that addresses the costs of Labor. All Documentation and Communication by Defendant Delta Air Lines and its employees that mention Labor Unionization especially in the years the Plaintiff Randall Joseph May was employed by Defendant.

**REQUEST NO. 6:** Documents related to the budgeting and strategy of Delta Air Lines entire Equal Employment Opportunity department. Also include the Documentation of the budget for Delta Air Lines legal department and financials of the budget to Settle with employees who have faced mistreatment for years 2016, 2017, 2018, 2019, 2020 and 2021.